



HARRIS, ST. LAURENT
AND CHAUDHRY LLP

July 17, 2019

VIA ECF:

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. David Wagner, et al., 19-cr-437 (AKH)

Your Honor:

I am one of the lawyers representing defendant Marc Lawrence in this case. I write to respectfully request an extension of time from July 17, 2019 to July 24, 2019 for Mr. Lawrence to fulfill the conditions set by the Court for his release on June 26, 2019. The Court previously granted Mr. Lawrence's request of an extension of time from July 10, 2019 to July 17, 2019.

Mr. Lawrence needs this additional time to secure the co-signers required for the personal recognizance bond and to identify property that could be used as an alternative to the Avon Lake property previously identified as a possible security for the bond, as it appears that property is no longer available for that purpose due to proceedings in Mr. Lawrence's personal bankruptcy.

The government consents to this request.

Respectfully submitted,
/s/
Andrew St. Laurent

SO ORDERED:

Honorable Alvin K. Hellerstein
United States District Judge

cc: AUSA Jilan Kamal, Esq. (by ECF)
AUSA Sagar Ravi, Esq. (by ECF)